

July 5, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane
Room 10161
Rockville, MD 20852

6724 '99 JUL 15 A11:24

RE: Docket #98N-1038
Irradiation in the production, processing,
Handling of food


To Whom It May Concern:

I am extremely concerned about the prospect of weakening the labeling requirements for irradiated food. Any food or any foods containing ingredients that have been treated by irradiation should be clearly labeled with a written statement on the principal display panel indicating such a treatment. The statement should be easy to read and placed in close proximity to the name of the food and be accompanied by the Radura, the international symbol of irradiated food. If the food is not packaged this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale.

Like other labels, irradiation labels are required by the FDA to be truthful and not misleading. I believe that the terms "treated with radiation" or "treated by irradiation" should be retained. Any phrase involving the word "pasteurization" is misleading because pasteurization is an entirely different process of rapid heating and cooling. I recognize that Radura as information regarding a material fact of food processing. The requirement of irradiation disclosure (both label and Radura) should not expire at any time in the future. The material fact of processing remains. Even if some consumers become familiar with the Radura, new consumers (i.e., young people, immigrants) will not be. The symbol should be clearly understandable at the point of purchase for everyone. If there is no label consumers will be misled into believing that the food has not been irradiated.

Thank you for your consideration of these concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Stacey DeGroff", with a stylized flourish at the end.

Stacey DeGroff

98N 1038

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